

## 4.0 REVISIONS TO THE REVISED DRAFT EIR

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Revisions have been made to the Revised Draft Environmental Impact Report (RDEIR). This chapter provides the location, chapter or section number, title, and page number from the RDEIR, and shows the complete sentence(s) where the change was made. Text added to the RDEIR is shown in underline format, and deleted text is shown in ~~striketrough~~.

This chapter, in combination with the RDEIR, the Responses to Comments, and the Mitigation Monitoring and Reporting Program constitute the Final EIR. Due to the nature of the text changes that are presented below, the changes are displayed individually rather than in a reproduction of the entire RDEIR. This presentation of revisions to the RDEIR is consistent with *State CEQA Guidelines* Section 15162 detailing required Final EIR contents.

### Corrections to Section 1.0, Introduction

#### Changes to Page 1.0-8 Text

The text on RDEIR page 1.0-8, which briefly summarizes the steps associated with the Final EIR and its certification, has been corrected to include CEQA requirements with respect to findings related to alternatives. The correction is minor and does not change the impact analysis or the conclusions of the analysis.

In conjunction with their certification of the Final EIR, The Regents must also adopt written findings that address each significant adverse environmental effect identified in the Final EIR, consistent with Section 15091 of the *State CEQA Guidelines*. The Regents must also adopt written findings that specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or alternatives identified in the final EIR. The Regents must also adopt the MMRP to ensure implementation of mitigation measures that have been incorporated into the project to reduce or avoid significant effects during project construction and/or implementation.

### Corrections to Section 2.0, Executive Summary

#### Changes to Page 2.0-9 Text

The text on RDEIR page 2.0-9, which describes the parking spaces included in Alternative 4, has been corrected to clarify that the parking spaces at the North Remote site would be decked. This minor change has no effect on the comparative impacts of this alternative analyzed and reported in the RDEIR.

~~This alternative would provide up to approximately 336 parking spaces at the Heller site, comprised of approximately 170 on-site surface parking spaces also include an on-site MBR plant to serve the proposed housing, and approximately 166 100 parking spaces in a decked capacity (either on-site by adding a parking deck to the southwestern parking lot or off-site at the Rachel Carson lot). This alternative would include an MBR plant at the Heller site to locally treat wastewater and generate recycled water for toilet flushing and irrigation along with significant extensions of utility infrastructure and potential roadway development.~~

#### **Changes to Page 2.0-10 Text**

The text on RDEIR page 2.0-10, which describes the on-campus beds that would be developed under Alternative 5, has been adjusted to correctly state the number of student beds that would be provided under this alternative. This minor change has no effect on the comparative impacts of this alternative analyzed and reported in the RDEIR.

The Heller site would be redeveloped to provide approximately ~~2,420-2,478~~ student beds, including ~~2,060~~ 2,118 undergraduate student beds, 220 beds for graduate students, 140 units for students with families, an expanded childcare facility, along with student support, dining, and amenity space.

#### **Changes to Page 2.0-12 Text**

The text on RDEIR page 2.0-12, which describes project development under Alternative 6, has been adjusted to include correctly state the number of student beds and building heights. This minor change has no effect on the comparative impacts of this alternative analyzed and reported in the RDEIR.

The Heller site would be redeveloped to provide approximately ~~2,420-2,478~~ student beds, including ~~2,060~~ 2,118 undergraduate student beds, 220 beds for graduate students, 140 units for students with families, an expanded childcare facility, along with student support, dining, and amenity space. Approximately 594 undergraduate beds along with student support and amenity space would be provided in buildings constructed on the ECI site. The 220 graduate student beds, along with appropriate support and amenity space, would be provided on a portion of the University-owned 2300 Delaware Avenue property (Delaware site) located in the western portion of Santa Cruz. The Hagar site would not be developed under this alternative.

Undergraduate student housing on the Heller site would be located in Buildings 1 through 4, which would be five to seven stories in height. Students with families would be housed in Building 5, which would be five to seven stories with the childcare center located on the ground

floor. Elimination of one of the buildings included in the proposed project, would allow for better spacing for these two distinct student communities. This alternative would provide approximately 338 surface parking spaces at the Heller site, comprised of approximately 170 on-site surface parking spaces and approximately 168 parking spaces in a decked capacity (either on-site by adding a one-story parking deck to the southwestern parking lot or off-site at the Rachel Carson parking lot).

As with Alternative 5, about 594 undergraduate beds would be located within two seven to eight-story buildings along with additional student support and amenity space on the ECI site. The ECI site would provide for 100 parking spaces utilizing a decked facility approach. At the Delaware site, the proposed four ~~to five~~ story buildings for graduate students would be located on the parking lot and tennis courts at the northern end of the site. There is ample space at the Delaware site to add replacement surface parking to serve the proposed housing.

#### **Changes to Page 2.0-13 Text**

The text on RDEIR page 2.0-13, which describes the on-campus beds that would be developed under Alternative 7, has been adjusted to include a correctly state the number of student beds that would be provided under this alternative. This minor change has no effect on the comparative impacts of this alternative analyzed and reported in the RDEIR.

The Heller site would be redeveloped to provide approximately ~~1,510~~ 1,572 student beds, including ~~1,150~~ 1,212 undergraduate student beds, 220 graduate student beds, and 140 units for students with families, an expanded childcare facility, along with student support, dining, and amenity space.

### **Corrections to Section 3.0, Project Description**

#### **Changes to Page 3.0-23 Text**

#### **3.4.3 Hagar Site**

As noted above, there are currently 199 family student housing units and a childcare center located on the Heller site which would be demolished to construct the proposed undergraduate and graduate student housing. Of the 199 units, 196 units are occupied at this time. On average, 87 of these units are occupied by families with children. The new housing on the Hagar site would replace 140 of these units, including all of the units occupied by families with children. The remaining family student housing units would be replaced by apartments suitable for couples in the two new graduate housing buildings on the Heller site.

A new and larger childcare facility would be constructed on the Hagar site. The proposed site plan for the Hagar site is presented in **Figure 3.0-6a**. **Figure 3.0-6a(1)** presents the site contours with the development of the project.

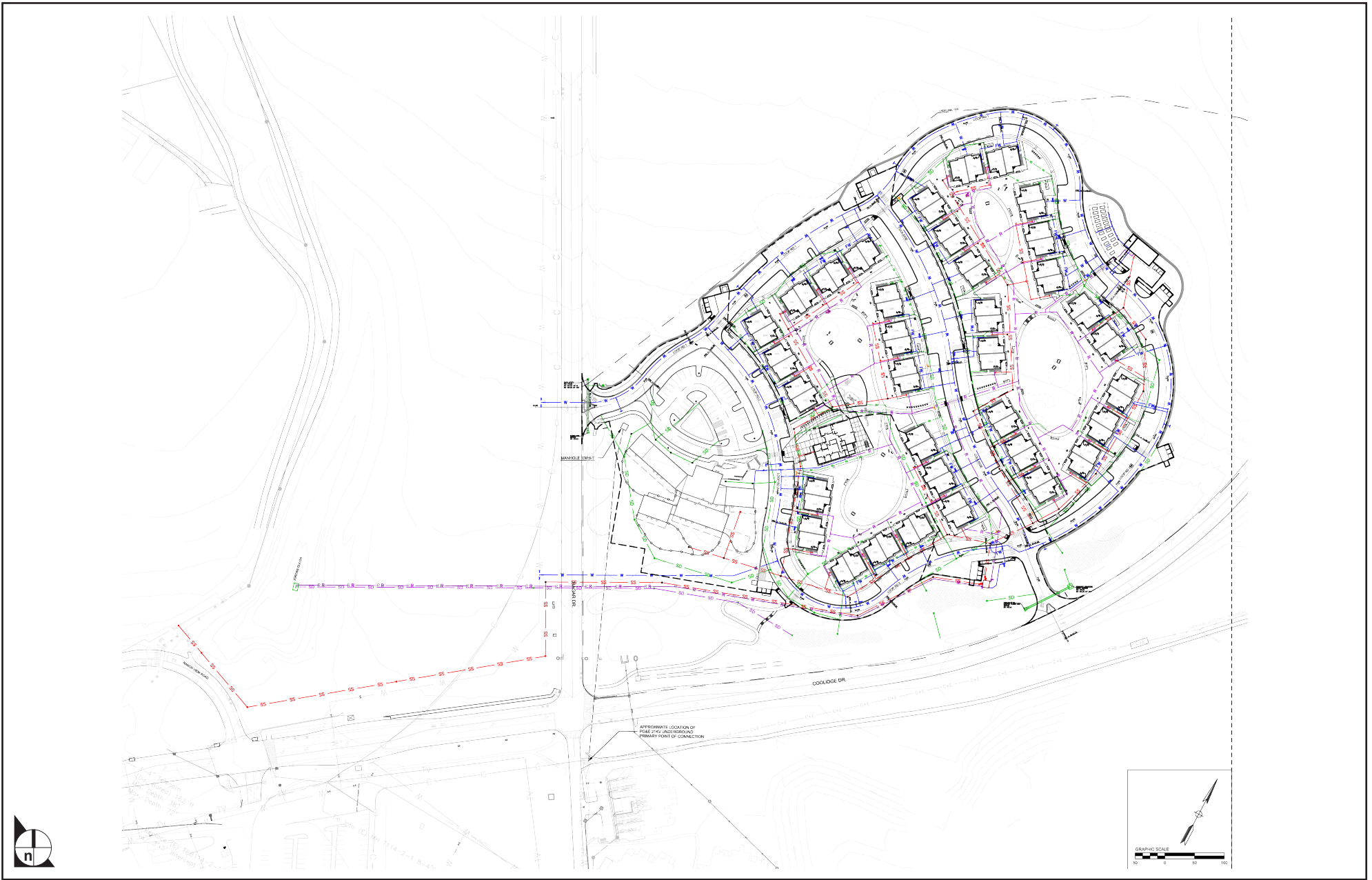


SOURCE: UCSC, 2017

FIGURE 3.0-6a(1)

**Changes to Page 3.0-28 Graphic**

**Figure 3.0-6b, Off-Site Utilities – Hagar Site** has been updated to include the electrical point of connection for the project.



SOURCE: University of California, Santa Cruz, 2018

FIGURE 3.0-6b

Off-site Utilities - Hagar Site

### Changes to Page 3.0-28 Text

The second paragraph under the subheading Storm Water on page 3.0-28 of the RDEIR is revised to explain how storm water would be handled and to clarify that the detention basins on the Hagar site will be lined. The revision is minor and does not change the impact analysis or the conclusions of the analysis.

The proposed project would create approximately 6.32 acres of new impervious surfaces, including the residential buildings, childcare facility, pathways, roadways, and parking areas on the Hagar site, which would result in the generation of storm water runoff that would require collection and disposal. The project is required to comply with water quality (treatment) and volume requirements as defined by the UC Santa Cruz Post-Construction Storm Water Management Requirements. These require that new runoff be minimized, storm water be treated before discharge into receiving waters, and that the post-development peak flows discharged from the site not exceed pre-project peak flows for the 2- through 10-year 24-hour storm events. The site geology does not allow for localized infiltration in the vicinity of the new buildings where the additional runoff would be generated. Therefore, with the exception of runoff from paths that would drain to nearby landscaped areas, all site runoff would be directed to storm drains located in the proposed roadways. The collection system would convey runoff to three lined bio-filtration basins along Glenn Coolidge Drive. In order to limit the impact to the existing sinkhole at the intersection of Hagar and Glenn Coolidge Drives, the metered and treated runoff from the two bio-filtration basins would be detained and discharged into the sinkhole whereas runoff from the third bio-filtration basin would be detained and metered into a storm drain that would cross under Hagar Drive and run in a southerly direction to discharge into Jordan Gulch south of the Hagar site.

### Corrections to Section 4.1, Aesthetics

#### Changes to Figures 4.1-19 and 20

RDEIR Figures 4.1-19 and 20 have been replaced with revised **Figures 4.1-19** through **20a and 20b** to better depict the project as viewed from Glenn Coolidge Drive.





SOURCE: Capstone, 2018

FIGURE 4.1-19

Existing View from Glenn Coolidge Drive [Southwestern Corner of Hagar Site - Viewpoint 11]



SOURCE: Capstone, 2018

FIGURE 4.1-20a

View from Glenn Coolidge Drive with Project [Southeastern Corner of Hagar Site] (6 Months Growth)



SOURCE: Capstone, 2018

FIGURE 4.1-20b

View from Glenn Coolidge Drive with Project [Southeastern Corner of Hagar Site] (10 Years Growth)

## Corrections to Section 4.3, Biological Resources

### Changes to Page 4.3-29 Text

Table 4.3-3 on page 4.3-29 of the RDEIR has been revised to include LRDP Mitigation Measure BIO-11, which was inadvertently not included in the RDEIR, and to correct the number of one mitigation measure in the 2005 LRDP EIR from BIO-8B to BIO-12B. The correction is minor and does not change the impact analysis or the conclusions of the analysis.

**Table 4.3-3**  
**2005 LRDP EIR Mitigation Measures**

Mitigation Measure	Description
BIO-2A	<p>The Campus shall avoid removal of coastal prairie through redesign of proposed development areas and road alignments where possible. The design of all campus facilities shall include a buffer between development and prairie in order to reduce indirect impacts from edge effects such as increases in noxious weed species. The width of each buffer will depend on the site and the nature of adjacent development. The minimum buffer shall be 30 feet from the edge of paved areas or buildings to the edge of coastal prairie.</p> <p>Landscaped areas are acceptable within the habitat buffer, provided that they are planted with species that are not invasive in coastal prairie (i.e., no non-native grasses) and are not fire prone.</p>
BIO-2B	<p>The Campus shall mitigate for unavoidable losses of coastal prairie by restoring coastal prairie at a 3:1 ratio. Before impacts to coastal prairie occur, a management and monitoring plan, including quantitative success criteria, shall be prepared for the restoration site. Success criteria for the restoration shall include providing equivalent or greater overall (rather than species specific) cover of native perennial bunchgrasses (such as purple needlegrass, California oatgrass, and Pacific panic grass) and native forbs (such as white hyacinth and dwarf brodiaea) as is found in the coastal prairies that will be lost to development. Management of the site shall continue for at least 15 years to protect the coastal prairie management areas from reverting to annual grassland. If coastal prairie restoration does not meet the success criteria after 5 years, restoration shall be remedied (e.g., replanting) or restoration attempted on a new, more suitable site.</p>
BIO-6	<p>To avoid or minimize the introduction or spread of noxious weeds into uninfested areas, the Campus shall incorporate the following measures into the project plans and specifications for work at the project sites:</p> <ul style="list-style-type: none"> <li>• Only certified, weed-free materials shall be used for erosion control.</li> <li>• The Campus shall identify appropriate best management practices to avoid the dispersal of noxious weeds. The Campus shall then include appropriate practices in construction standards to be implemented during construction in all north campus areas. Typical best management practices include the use of weed-free erosion control materials and revegetation of disturbed areas with seed mixes that include native species and exclude invasive non-natives.</li> <li>• In uninfested areas, topsoil removed during excavation shall be stockpiled and used to refill the trench on site if it is suitable as backfill.</li> <li>• For the proposed utility corridors at the Heller and Hagar sites, surveys shall be conducted for noxious plant species in construction and staging areas before and during construction. Photographs of the utility corridor both before and after construction shall be taken to document site conditions.</li> <li>• Rumble-strips shall be installed to reduce transport of noxious weed seeds within the soil on truck and equipment tires.</li> <li>• Noxious species shall be removed if introduced to the sites.</li> </ul>

Mitigation Measure	Description
BIO-8	The Campus shall continue to limit visitation of caves on campus, and discourage activities by members of the public that could jeopardize the physical integrity, condition or scientific value of the caves, through appropriate signage and educational literature, Campus Natural Reserve website information, or other appropriate measures.
BIO-9	<p>UC Santa Cruz will implement the following measures to avoid direct impacts to the CRLF:</p> <ul style="list-style-type: none"> <li>• Initial ground-disturbing activities in the Moore Creek watershed, including grading and vegetation removal, will not occur during the period when CRLF are most likely to be in or near aquatic environments and not dispersing. Therefore, construction in CRLF habitat shall be restricted to the period after May 1 and before October 15.</li> <li>• A qualified biologist shall examine the project area 24 hours before project activities begin and during any initial vegetation, woody debris, tree removal, or other initial ground-disturbing activities. If a CRLF is observed at any time before or during project activities, all activities will cease. The Campus will coordinate with the appropriate agencies to develop avoidance measures before commencing project activities.</li> <li>• Initial construction activities, including vegetation removal and grading, shall not occur when it is raining.</li> </ul>
BIO-10	<p>Prior to construction or site preparation activities, a qualified biologist shall be retained to conduct nest surveys at each site that has appropriate nesting habitat. The survey shall be required for only those projects that will be constructed during the nesting/breeding season of golden eagle, northern harrier, long-eared owl, white-tailed kite, or other special-status birds, or other birds protected by the Migratory Bird Treaty Act and/or California Fish and Game Code (typically February 1 through August 31).</p> <p>The survey area shall include all potential nesting habitat, including the California bay forest, redwood forest, isolated trees, shrubs, and grasslands that are within 200 feet of the proposed project grading boundaries. The survey shall be conducted no more than 14 days prior to commencement of construction activities.</p> <p>If active nests of golden eagle, northern harrier, long-eared owl, white-tailed kite, and other special-status birds, or other species protected under the Migratory Bird Treaty Act and the California Fish and Game Code are present in the construction zone or within 300 feet of the construction zone, a temporary fence shall be erected at a distance of 50 to 300 feet around the nest site (to be determined by the biologist according to the species and site conditions). Clearing and construction within the fenced area shall be postponed until juveniles have fledged and there is no evidence of a second nesting attempt as determined by the biologist.</p>
BIO-11	<p><u>Prior to construction or site preparation activities, a qualified biologist shall be retained to conduct nest surveys at each site that has appropriate nesting habitat. The survey shall be required for only those projects that will be constructed during the nesting/breeding season of golden eagle, northern harrier, long-eared owl, white-tailed kite, or other special-status birds, or other birds protected by the Migratory Bird Treaty Act and/or California Fish and Game Code (typically February 1 through August 31).</u></p> <p><u>The survey area shall include all potential nesting habitat, including the California bay forest, redwood forest, isolated trees, shrubs, and grasslands that are within 200 feet of the proposed project grading boundaries. The survey shall be conducted no more than 14 days prior to commencement of construction activities.</u></p> <p><u>If active nests of golden eagle, northern harrier, long-eared owl, white-tailed kite, and other special-status birds, or other species protected under the Migratory Bird Treaty Act and the California Fish and Game Code are present in the construction zone or within 300 feet of the construction zone, a temporary fence shall be erected at a distance of 50 to 300 feet around the nest site (to be determined by the biologist according to the species and site conditions). Clearing and construction within the fenced area shall be postponed until juveniles have fledged and there is no evidence of a second nesting attempt as determined by the biologist.</u></p>
BIO-12A	Prior to any ground disturbance of grassland habitats on the lower campus, a qualified biologist will conduct a preconstruction survey to identify western burrowing owls and/or potential habitat features (e.g., burrows) and to evaluate use by burrowing owls in

Mitigation Measure	Description
	<p>accordance with current CDFW survey guidelines (CDFG 2012).<sup>1</sup> Surveys will be conducted within the proposed disturbance footprint and a 500-foot radius of the disturbance boundary of each proposed project. For construction activities occurring within the western burrowing owl habitat (whether during breeding or non-breeding seasons), surveys will be conducted within 30 days prior to construction. The surveys will document whether burrowing owls are nesting on or directly adjacent to disturbance areas. Survey results will be valid only for the season during which the survey is conducted. If western burrowing owls are found during the breeding or nonbreeding season, Mitigation BIO-<del>8B</del>-12B will be implemented.</p>
<p><b>BIO-12B</b></p>	<p>If burrowing owls are found, the Campus will avoid all burrowing owl nest sites to the extent feasible. Avoidance will include establishment of a non-disturbance buffer zone of at least 250 feet around each nest site during the breeding season. If burrowing owls are found outside the breeding season (September 1–January 31), avoidance will include the establishment of at least a 160-foot non-disturbance buffer zone around each burrow being used. In both cases, highly visible temporary construction fencing will delineate the buffer zone.</p> <p>If burrowing owl nest sites cannot be avoided, burrowing owls may be excluded from burrows using one-way doors, provided that a Burrowing Owl Exclusion Plan is developed and approved by CDFW prior to implementation. This measure is described in detail below.</p> <p>In order to displace burrowing owls without destroying eggs, young, or adults, one-way doors will be installed on owl burrows before February 1 prior to disturbance, and each burrow will be monitored following CDFW’s protocol (CDFG 2012). Suitable artificial burrows will be created nearby according to the conservation measures established for this species. The protocol includes monitoring the burrow for a 48-hour period after the one-way doors are installed. The doors will be checked every 24 hours following installation to determine whether they are still intact. If the one-way door is still correctly installed after a continuous 48-hour period (i.e., no animals have dug up the door and rendered it useless), then the one-way door will be removed and the burrows will be excavated using hand tools and plastic tubing to maintain an escape route for any animals still inside the burrow.</p>
<p><b>BIO-13A</b></p>	<p>If tree removal or grading activity commences on a project site in the north campus during the breeding season of native bat species (April 1 through August 31), a field survey shall be conducted by a qualified biologist to determine whether active roosts of special-status bats (pallid bat, Townsend’s big-eared bat, western red bat, long-eared myotis, fringed myotis, long-legged myotis, yuma myotis, or greater western mastiff bat) are present on the site or in areas containing suitable roosting habitat within 50 feet of the site.</p> <p>Field surveys shall be conducted in late April or early May in the season before construction begins, when bats are establishing maternity roosts but before pregnant females give birth. If no roosting bats are found, no further mitigation would be required.</p>
<p><b>BIO-13B</b></p>	<p>If roosting bats are found, disturbance of the maternity roosts shall be avoided by halting construction until either (1) the end of the breeding season or, (2) a qualified biologist removes and relocates the roosting bats in accordance with CDFW requirements.</p>
<p><b>BIO-14</b></p>	<p>A pre-construction/grading survey of all suitable San Francisco dusky-footed woodrat habitat within 100 feet of the proposed grading footprint shall be conducted by a qualified biologist to detect any woodrat nests. The survey shall be conducted no more than 14 days prior to commencement of construction activities. If active nests (stick houses) are identified within the construction zone or within 100 feet of the construction zone, a fence shall be erected around the nest site with a 100-foot minimum buffer from construction activities. At the discretion of the biologist, clearing and construction within the fenced area would be postponed or halted until juveniles have left the nest. The biologist shall serve as a construction monitor during those periods when construction activities will occur near active nest areas to ensure that no inadvertent impacts on these nests will occur. If any woodrat is observed within the grading footprint outside of the breeding period, individuals shall be trapped and relocated to a suitable location in proximity to the project site by a qualified biologist in accordance with CDFW requirements, and the nest dismantled so it cannot be reoccupied.</p>

Source: UC Santa Cruz 2006

Mitigation Measure	Description
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<sup>a</sup> LRDP Mitigations BIO-12A and 12B have been updated with minor changes. The original mitigation measures used the acronym CDFG. That is revised here to CDFW to reflect the revised name of the California Department of Fish and Wildlife. In addition, the LRDP mitigation refers to the 1995 Burrowing Owl survey guidelines. Those have since been updated and the current guidelines are from 2012.

### Changes to Page 4.3-14 Text

Text on page 4.3-14 of the RDEIR has been corrected to reflect that brush rabbit, and not cottontail, occurs on the campus. The correction is minor and does not change the impact analysis or the conclusions of the analysis.

Wildlife or animal signs observed at or near the Hagar site during LSA's surveys consist of those typically associated with grassland habitats, including red-tailed hawk, red-shouldered hawk, American kestrel, white-tailed kite (*Elanus leucurus*), common raven, California scrub-jay, northern mockingbird (*Mimus polyglottos*), mourning dove (*Zenaida macroura*), Anna's hummingbird (*Calypte anna*), yellow-rumped warbler (*Setophaga coronata*), oak titmouse (*Baeolophus inornatus*), bushtit, chestnut-backed chickadee (*Poecile rufescens*), Bewick's wren, Say's phoebe (*Sayornis saya*), European starling (*Sturnus vulgaris*), western meadowlark (*Sturnella neglecta*), savannah sparrow (*Passerculus sandwichensis*), golden-crowned sparrow (*Zonotrichia atricapilla*), house finch, Botta's pocket gopher, California ground squirrel (*Otospermophilus beecheyi*), ~~Audubon's cottontail (*Sylvilagus audubonii*)~~, brush rabbit (*Sylvilagus bachmani*), black-tailed deer, and coyote (*Canis latrans*).

### Changes to Page 4.3-16 Text

The text on page 4.3-16 of the RDEIR has been revised to include the following information. The revision is minor and does not change the impact analysis or the conclusions of the analysis.

Suitable habitat, including Watsonville loams, for this species is not present on the Hagar site and no Ohlone tiger beetles were found in the East Meadow during surveys conducted by Tara Cornelisse in 2013 (Cornelisse 2013). Therefore, this species is not likely to occur at the Hagar site.

### Changes to Pages 4.3-34 to -37 Text

In response to comments received, SHW Mitigation Measures BIO-1A through BIO-1D on pages 4.3-34 to 4.3-37 of the RDEIR are revised as shown below. These revisions are minor and do not change the impact analysis or the conclusions of the analysis.

**SHW Mitigation BIO-1A:** California oat grass grassland

- The restoration to compensate for the loss of the California oat grass grassland shall be performed using native species from local seed sources. Methods of the restoration shall involve collection/application of seeds, collection/planting of propagules/plugs, and/or salvaging of top soils under the supervision of a qualified restoration ecologist. The management and monitoring plan shall be reviewed and approved by the Campus and a third-party qualified restoration ecologist that is not implementing the project. The management and monitoring plan will include (a) performance standards to ensure the efficacy of the mitigation; (b) timing requirements; (c) requirements for review and approval of final plans by the Campus as appropriate; (d) specific benchmarks and other criteria that must be met; (e) specific implementing actions; (f) monitoring and maintenance procedures and requirements; (g) qualification requirements for biologists; and (h) other requirements needed to ensure the identified impacts are mitigated to a less than significant level. Success criteria shall also include monitoring of noxious weeds.

**SHW Mitigation BIO-1B:** Purple needlegrass grassland

For any unavoidable permanent losses of purple needlegrass, the Campus shall mitigate by (1) permanently protecting existing purple needlegrass grassland within the campus at a 3:1 ratio to the acreage removed, or (2) by restoring purple needlegrass grassland at a ratio of at least 1:1.

- In the event that restoration is the chosen mitigation, the Campus will identify one or more potential sites for restoration on the campus, and will direct the preparation of a management and monitoring plan, including quantitative success criteria, for the restoration site(s). The plan will specify that restoration shall be performed with purple needlegrass from local seed sources. Methods of the restoration shall involve collection/application of seeds, collection/planting of propagules/plugs, and/or salvaging of top soils under the supervision of a qualified restoration ecologist. Success criteria for the restoration shall include providing equivalent or greater overall (rather than species specific) cover of purple needlegrass as is found in the purple needlegrass grassland that will be lost to development. Success criteria shall also include monitoring of noxious weeds. The monitoring period for the restoration of purple needlegrass grassland shall be a minimum of 5 years or until success criteria are met. This management and monitoring plan shall be reviewed and approved by the Campus and a qualified restoration ecologist who is not the



consultant implementing the project. The management and monitoring plan will include (a) performance standards to ensure the efficacy of the mitigation; (b) timing requirements; (c) requirements for review and approval of final plans by the Campus as appropriate; (d) specific benchmarks and other criteria that must be met; (e) specific implementing actions; (f) monitoring and maintenance procedures and requirements; (g) qualification requirements for biologists; and (h) other requirements needed to ensure the identified impacts are mitigated to a less than significant level. Management of the site shall continue for at least 5 years to protect the restored areas from reverting to annual grassland. If purple needlegrass restoration does not meet the success criteria after 5 years, restoration shall be remedied (e.g., replanting) or restoration will be attempted on a new, more suitable site. This same plan will also apply to restored purple needlegrass grassland within the temporarily impacted areas.

**SHW Mitigation BIO-1C: Creeping Rye Grass Turfs**

- Where creeping rye grass turfs are temporarily impacted, the temporarily affected areas will be restored by seeding and/or planting plugs of creeping rye grass. The restoration shall be performed using native species from local seed sources.
- For any unavoidable permanent losses for up to 0.2 acre of creeping rye grass turfs, the Campus shall mitigate by (1) permanently protecting ~~an equivalent acreage of existing~~ creeping rye grass turfs within the campus at a 3:1 ratio to the acreage removed or (2) by restoring creeping rye grass turfs at a ratio of at least 1:1.
- In the event that restoration is the chosen mitigation for the permanently impacted creeping rye grass turfs, the Campus will identify one or more potential sites for restoration on the campus, and will direct the preparation of a management and monitoring plan, including quantitative success criteria, for the restoration site(s). The plan will specify that restoration shall be performed with creeping rye grass from local seed sources. Methods of the restoration shall involve collection/application of seeds, collection/planting of propagules/plugs, and/or salvaging of top soils under the supervision of a qualified restoration ecologist. Success criteria for the restoration shall include providing equivalent or greater overall (rather than species specific) cover of creeping rye grass as is found in the creeping rye grass turfs that will be impacted. Success criteria shall also include monitoring of noxious weeds. This management and monitoring plan shall be reviewed and approved by the Campus and a qualified restoration ecologist who is

not the consultant implementing the project. The monitoring period for the restoration of creeping rye grass turfs shall be a minimum of 5 years or until success criteria are met. Management of the site shall continue for at least 5 years to protect the restored areas from reverting to annual grassland. If creeping rye grass restoration does not meet the success criteria after 5 years, restoration shall be remedied (e.g., replanting) or restoration will be attempted on a new, more suitable site. This same plan will also apply to restored creeping rye grass turfs within the temporarily impacted areas.

**SHW Mitigation BIO-1D: California Bay Forest**

Mitigation for Loss of Understory

- Where California bay forest understory vegetation is temporarily impacted, the temporarily affected areas will be restored by seeding and/or planting native California bay forest understory plants, such as California blackberry, coyote brush, and yerba buena.
- For any unavoidable permanent losses, the Campus shall mitigate (1) by permanently protecting an equivalent acreage of existing California bay forest within the campus at a 3:1 ratio to the acreage impacted, or (2) by restoring California bay forest understory vegetation at a ratio of at least 1:1.
- In the event that restoration is the chosen mitigation, the Campus will identify one or more potential sites for restoration on the campus, and will direct the preparation of a management and monitoring plan, including quantitative success criteria, for the restoration site(s). The plan will specify that restoration shall be performed with California bay forest understory vegetation from local plant sources. Methods of the restoration shall involve collection/application of seeds and/or collection/planting of propagules/plugs under the supervision of a qualified restoration ecologist. Success criteria for the restoration shall include providing plant survivorship (or established) and providing equivalent or greater overall (rather than species specific) cover of California bay forest understory vegetation as is found in the understory vegetation that will be impacted due to the storm drain improvements. Success criteria shall also include monitoring of noxious weeds. This management and monitoring plan shall be reviewed and approved by the Campus and a qualified restoration ecologist who is not the consultant implementing the project. The monitoring period for the

restoration of California bay forest understory vegetation shall be a minimum of 5 years or until success criteria are met. Management of the site shall continue for at least 5 years. If restoration does not meet the success criteria after 5 years, restoration shall be remedied (e.g., replanting) or restoration will be attempted on a new, more suitable site. This same plan will also apply to restored understory vegetation within the temporarily impacted areas.

#### Changes to Pages 4.3-45 and -46 Text

Based on staff review, SHW Impact BIO-6 which is presented on pages 4.3-45 and 4.3-46 of the RDEIR is revised as shown below. The revision is minor and does not change the impact analysis or the conclusions of the analysis.

**SHW Impact BIO-6: The proposed project could result in direct impacts to California giant salamanders and American badgers. (*Potentially Significant; Less than Significant with Mitigation*)**

No suitable habitat for California giant salamanders is present within or adjacent to the Hagar site. Construction of the project within the proposed utility corridor and storm drain improvements area within the California bay forest associated with the Heller site could directly impact California giant salamanders, particularly within the forest habitats, if present during construction activities. The impact would be potentially significant.

American badger occurs in grassland habitat where prey species, such as small mammals, occur. This species is unlikely to occur within the Porter Meadow near the Heller site due to the limited habitat present, the site's proximity to urban development, and isolation from larger grasslands. Although grassland habitat is present on the Hagar site, no burrows or potential den sites were observed on the Hagar site during focused surveys for burrowing owls conducted in December 2017 and in November 2018. The absence of burrows also suggests that abundant prey for the American badger, such as California ground squirrels, is not present on the Hagar site. For these reasons, badgers are unlikely to be present on the Hagar site for any period of time. Nonetheless, a dead badger was found in 2004 north of the Hagar site between the East Remote parking lot and the East Field, and Campus Natural Reserve staff reported signs that a badger had passed through the Great Meadow in November or December 2018. Therefore, because grassland habitat is present on the Hagar site, this species could occur at or near the Hagar site and could be affected, if present during project construction. The impact would be potentially significant.

**Mitigation Measures:**

**SHW Mitigation BIO-6A:** Implement **SHW Mitigations BIO-5A** and **-5B**.

**SHW Mitigation BIO-6B:** Pre-construction surveys for American badger and potential badger burrows shall be conducted by a qualified biologist prior to construction activities. The survey shall be conducted within 14 days prior to the start of construction activities within 300 feet of the project site. If occupied burrows are found, the qualified biologist shall consult with CDFW to determine an appropriate buffer. If the occupied burrow is determined to be a natal badger den, then the burrow would have to remain protected until the juveniles are old enough to move from their den.

**Significance after Mitigation:** Most of the measures listed in **SHW Mitigations BIO-5A** and **-5B** would also apply to California giant salamanders, American badgers, other amphibians, reptiles, and small to medium-sized mammals and implementation of these measures, such as construction monitoring, and environmental awareness training would reduce the potential for direct impacts to California giant salamanders, American badgers and other small to medium-sized animals. In addition, SHW Mitigation BIO-6B would be implemented. Implementation of **SHW Mitigations BIO-5A** and **-5B** and **SHW Mitigation BIO-6B** would reduce the impacts to California giant salamanders and American badgers to a less than significant level.

**Changes to Pages 4.3-39 and -40 Text**

In response to comments received, SHW Mitigation BIO-4 on RDEIR pages 4.3-39 to 4.3-40 is revised as follows. The revision is minor and does not change the impact analysis or the conclusions of the analysis.

**SHW Mitigation BIO-11B:** The Campus shall implement the following measures:

- Require mandatory stewardship training for residents of the proposed Heller site and Hagar site housing (either online or in person) designed to bring awareness to sensitive environments and ways to reduce impacts to the cave and other sensitive biological resources in proximity of the project sites. The training could be provided by the CNR.
- Install additional interpretive signage about the cave species, other sensitive plant and wildlife species, and their habitats, Best Stewardship/Leave no Trace principles for lessening the impact on the environment, and the CNR lands and mission.

- The CNR Manager will work with Campus Police to evaluate additional enforcement actions that may be implemented to address the unauthorized activities by campus and non-campus population at the cave.

**Changes to Pages 4.3-49 through -50 text**

Based on staff review, SHW Impact BIO-11, which is presented on pages 4.3-48 through 4.3-50 of the RDEIR, is revised as shown below to more precisely cross reference the mitigation measures that apply to this impact. The correction is minor and does not change the impact analysis or the conclusions of the analysis.

**SHW Impact BIO-11: The proposed project could interfere with the movement of wildlife species or with established native resident or migratory wildlife corridors. (Potentially Significant; Less than Significant with Mitigation)**

The 2005 LRDP EIR identified Moore Creek and Jordan Gulch as wildlife movement routes between the lower campus and the north campus (UCSC 2006). These corridors help provide connectivity for larger animals, such as raccoon, bobcat, gray fox, mountain lion, and black-tailed deer, to travel between the Great Meadow and adjacent open space areas of the upper campus, Wilder Ranch State Park, Pogonip City Park, and Henry Cowell Redwoods State Park. The proposed project would not affect these movement routes.

Wildlife movement corridors in the vicinity of the Heller site include the East Branch of Moore Creek to the east and Cave Gulch and Wilder Creek to the west. The intervening area between these drainages is developed with Rachel Carson and Porter Colleges as well as the FSH complex, which reduce the ability of wildlife to pass through this area. East-west movement between these drainages is available via Porter Meadow, although Heller Drive, retaining walls and other development do reduce movement through the area.

Placement of the proposed housing on the developed FSH complex site would avoid any reduction in the area available to wildlife for movement via Porter Meadow. Furthermore, the proposed development at the Heller site has been designed to enhance wildlife corridors (**Figure 3.0-5a**). Construction of the proposed utility corridor at the Heller site, however, could temporarily impact movement of smaller animal species, such as CRLF (See **SHW Impact BIO-5**). However, implementation of **SHW Mitigations BIO-5A and 5B** would reduce this impact to a less than significant level.

Development of the grasslands within the Hagar site would not significantly impact wildlife movement, since the large animal species could continue to move through a larger portion of the East Meadow north of the site, which would not be impacted. Additionally, other wildlife that currently move through the Hagar site are generally species that are adapted to the campus environment and would likely continue to move through or around the site after project construction is completed. The development is proposed at the lower end of the East Meadow near Hagar and Glenn Coolidge Drives and although the acreage of the meadow would decrease by approximately 17 acres, the proposed development would not fragment any grassland habitat within the East Meadow. The impact on wildlife movement at the Hagar site would be less than significant.

The proposed buildings at the Heller site would have the potential to affect movement of birds by causing birds to collide into the buildings. Resident and migratory birds could die or be injured by striking reflective and plate glass windows or other features associated with the new buildings. However, as discussed in **Section 3.0, Project Description**, bird-safe design features have been incorporated into the design of the buildings at the Heller site to make it easier for birds to detect buildings and avoid flying into the buildings. With respect to the Hagar site housing development, although the design of the project does not specifically include bird-safe design features, the buildings are low-rise (two stories), have variegated exteriors, and limited glazing. As a result, Hagar site development is also not expected to result in a significant impact on bird movement. However, to ensure the final designs of the project include appropriate bird safety designs, **SHW Mitigation BIO-11**~~B~~**** shall be implemented.

**Mitigation Measures:**

**SHW Mitigation BIO-11A:** Implement **SHW Mitigations BIO-5A and 5B**.

**SHW Mitigation BIO-11B:** The Campus shall review the final designs of the buildings at the Heller and Hagar sites to ensure that appropriate bird safety designs, including the most current Bird-safe Design Standards, have been effectively incorporated to reduce potential impacts to birds.

**Significance after Mitigation:** Less than significant

## Corrections to Section 4.6, Greenhouse Gas Emissions

Upon further review, the University noted an error in the estimated mobile source emissions for the project. The error was corrected which resulted in an increase in mobile source emissions, and in the overall emissions estimated for the project as a whole. The text and table on pages 4.6-25 and -26, and on pages 4.6-27 and -28 in the RDEIR have been corrected as shown below. This correction does not alter the impact conclusion. As the numbers below show, the per capita emissions associated with the project would still be substantially below the threshold used in this EIR.

### Changes to Pages 4.6-25 and -26 Text

**Table 4.6-2, Annual Project GHG Emissions (Metric Tons)**, presents the results of the CalEEMod model analysis in terms of annual MTCO<sub>2</sub>e. As shown in **Table 4.6-2** below, operation of the project would generate approximately ~~3,088~~ 4,260 MTCO<sub>2</sub>e/year at the Heller and Hagar sites combined. The net daily service population associated with the proposed project would be approximately 2,937 persons (see **Table 3.0-3 in Chapter 3.0, Project Description**). The per capita emissions would be ~~1.09~~ 1.49 MTCO<sub>2</sub>e/per capita/year, which would be well below the threshold of 3.9 MTCO<sub>2</sub>e/per capita/year used in this EIR to evaluate the project's GHG impact.

**Table 4.6-2  
Annual Project GHG Emissions (Metric Tons)**

Scenario	Year	Project Emissions (MTCO <sub>2</sub> e/year)
Operational Emissions	2023	<del>3,088</del> <u>4,260</u>
Amortized Construction Emissions		105
	Total	<del>3,193</del> <u>4,365</u>
	Per Capita Emissions	<del>1.09</del> <u>1.49</u> MT/per capita/year
	Current SLOAPCD Efficiency Threshold	4.9 MT/per capita/year
	Estimated 2025 Efficiency Threshold:	3.9 MT/per capita/year
	<i>Exceed Threshold?</i>	No

Source: Illingworth & Rodkin, 2018.

### Changes to Pages 4.6-27 and -28 Text

Following the passage of AB 32, some of regional air districts in the state, such as the SLOAPCD

and the Bay Area Air Quality Management District, based their planning and regulations on the requirements of AB 32, which included a reduction of GHG emissions to 1990 levels by 2020. As noted earlier in this section, MBARD has not put forth planning guidance for lead agencies within the NCCAB to use to evaluate a project's GHG impact based on consistency with AB 32. However, MBARD has recommended the use of thresholds and guidance provided by the neighboring SLOAPCD. The SLOAPCD set forth the GHG significance thresholds specifically to meet AB 32 requirements within its jurisdiction, and so plans and projects that meet those thresholds can be assumed to meet the requirements of AB 32. The per capita GHG emissions from the proposed project of ~~1.09~~ 1.49 MTCO<sub>2</sub>e/per capita/year would be below the SLOAPCD efficiency threshold of 4.9 MTCO<sub>2</sub>e/per capita/year that applies to projects through 2020. Therefore, the proposed project would not conflict with AB 32.

## **Corrections to Section 4.11, Transportation and Traffic**

### **Changes to Page 4.11-33 Text**

The text on page 4.11-33 of the RDEIR has been revised to state that about 1/3<sup>rd</sup> of the children at the childcare facility would be children that would be living on the Hagar site. The revision is minor and does not change the impact analysis or the conclusions of the analysis.

The proposed project is student family housing that will be replacing existing family housing units at the Heller site, and a childcare center for children of students, faculty, and staff. The Campus anticipates that ~~the majority~~ about 1/3<sup>rd</sup> of the children at the childcare center will be children from families living on the project site. The remaining children will be dropped off by faculty, staff and students living off campus on their way to and from the central campus, or dropped off by walking to the childcare center from the nearby employee housing.

## **Corrections to Section 4.13, Utilities and Service Systems**

Based on staff review, clerical errors were noted in the mitigation measures listed under SHW Impact UTIL-1 on page 4.13-19 and under SHW Impact UTIL-3 on page 4.13-21 of the RDEIR. For both impacts, the mitigation measures cross-referenced mitigation measures in the Biological and Cultural Resources sections of the RDEIR. However, the wrong mitigation measures were cross-referenced. Both impacts and associated mitigation measures are reproduced below and the errors in the cross-referencing are corrected. The revisions do not change the conclusions of the RDEIR with respect to these two impacts.

### **Changes to Pages 4.13-19 Text**



**Mitigation Measures:**

SHW Mitigation UTIL-1: Implement SHW Mitigations BIO-1A through 1D; BIO-5B; 1B, BIO-2, and CULT-2B2A through 2C.

**Changes to Pages 4.13-21 Text**

**Mitigation Measures:**

SHW Mitigation UTIL-3: Implement SHW Mitigations BIO-1A through 1D; BIO-5B; 1B, BIO-2, and CULT-2B2A through 2C.

**Corrections to Section 4.15, Other Resource Topics**

Based on internal review, the University has added the following population and housing impact to Chapter 4.15 on page 4.15-9 of the RDEIR.

**4.15.5 POPULATION AND HOUSING**

In accordance with Appendix G of the CEQA Guidelines and the 2005 LRDP EIR, the impacts of the proposed SHW project and the dining facilities expansion project related to population and housing would be considered significant if the projects would:

- Induce substantial population growth in the area, directly or indirectly by proposing new housing and employment; or
- Displace a substantial amount of housing or people, necessitating the construction of replacement housing elsewhere.

**Impact PH-1: Implementation of the proposed SHW and dining facilities expansion projects would not induce substantial population growth in the project area, either directly or indirectly, nor would they displace a substantial amount of existing housing or people, necessitating the construction of replacement housing elsewhere. (Less than Significant)**

**Induce Substantial Population Growth**

According to the significance criteria for evaluating environmental effects, the proposed project's impact related to population would be significant if the proposed project induced substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure). The direct increase in population due to is evaluated below. Population growth indirectly induced through extension of roads or other infrastructure is addressed in Section 6.0, Growth-Inducing

**Impacts.**

The proposed SHW project would develop new housing on the campus to accommodate approximately 3,072 students. Housing projects normally result in an increase in an area's population as the new housing is occupied. However, in the case of the SHW project, the project is proposed to serve the demand for housing associated with a maximum student population of 19,500 students, which is the enrollment level planned for in the 2005 LRDP and agreed to by all parties under the 2008 Comprehensive Settlement Agreement (CSA), and the 3,072 students who would occupy the proposed housing are within the enrollment level of 19,500 students. Even if the proposed project were not to be implemented, campus enrollment would increase within the limits imposed by the CSA, and the additional students that would be enrolled would seek housing off campus. Therefore, the project would not in itself cause the study area population to increase. Furthermore, by providing the housing on campus, the project would have the beneficial effects of reducing the demand for off-campus housing where the supply of housing is limited. The project's impact related to population growth would be less than significant.

**Displace People or Housing**

The proposed SHW project would involve construction on both the Heller and the Hagar sites. The Hagar site is currently undeveloped and no housing or people on that site would be displaced by the project. The Heller site is developed with 199 housing units of which 196 are occupied by student families. Of the 196 units, about 87 are occupied by student families with children and 109 units are occupied by families without children. The construction phasing of the proposed project has been structured to avoid displacement impacts on the student families. The project proposes to construct the needed replacement housing on the Hagar site and move the student families into the new housing before commencing the demolition of the existing housing on the Heller site. Further, the project proposes to build 140 units for student families with children, thereby more than fully replacing the units to be removed. Housing for the student families without children would be provided as part of the housing at the Heller site. In summary, the project will not displace a large number of housing units or people, necessitating the construction of new units outside of the project sites. The impact would be less than significant.

The dining facilities expansion project would not displace people or housing as it would be built on land where no housing is present. There would be no impact.

**Mitigation Measures:** No mitigation is required.

## Corrections to Section 5.0, Alternatives

### Changes to Table 5.0-1

Table 5.0-1 on page 5.0-17 of the RDEIR has been revised to reflect a correction related to parking under Alternative 4. The minor change has no effect on the analysis of the comparative impacts of this alternative.

**Table 5.0-1  
Summary Description of Project Alternatives**

Alt #	Alternative Name	Heller Site No. of Beds	Hagar Site No. of Beds	Other Site Beds	Total No. of Beds	Students to be housed off-campus	Parking	Building Heights	Phasing and Temporary Accommodations
--	Proposed Project	2,712 UG 220 GS	140 FSH	0	3,072	0	Heller-219 spaces  Hagar – 208 spaces	Heller, 5 to 7 stories; Hagar, 1-2 stories	N/A
Alt. 1	No Project	196 FSH	0	0	196	2,804	N/A	N/A	N/A
Alt. 2	Reduced Project	1,750 UG 220 GS 140 FSH	0	0	2,110	962	Heller-364 spaces; 98 surface spaces; remainder decked on- or off-site (RCC lot)	Heller, 5 to 7 stories	Student families to be moved off-campus temporarily (location to be determined); childcare center at Granary
Alt. 3	Heller Site Development Only	2,712 UG 220 GS 140 FSH	0	0	3,072	0	Heller-412 spaces; 98 surface spaces; remainder decked on- or off-site (RCC lot)	Heller, 5 to 10 stories	Student families to be moved off-campus temporarily (location to be determined); childcare center at Granary
Alt. 4	Heller Site and North Remote Site Development	1,212 UG 220 GS 140 FSH	0	1,500 UG North Remote	3,072	0	Heller-336 spaces; 170 surface spaces; remainder decked on- or off-site (RCC lot)  North Remote-100 <u>decked</u> spaces	Heller, 5 to 7 stories; North Remote, 6-8 stories	Student families to be moved off-campus temporarily (location to be determined); childcare center at Granary
Alt. 5	Heller Site and East Campus Infill Development	2,118 UG 220 GSH 140 FSH	0	594 UG East Campus Infill	3,072	0	Heller-382 spaces; 98 surface spaces; remainder decked on- or off-site (RCC lot)  East Campus Infill -	Heller, 5 to 7 stories; East Campus Infill, 7-8 stories	Student families to be moved off-campus temporarily (location to be determined); childcare center at Granary

4.0 Revisions to the Revised Draft EIR

Alt #	Alternative Name	Heller Site No. of Beds	Hagar Site No. of Beds	Other Site Beds	Total No. of Beds	Students to be housed off-campus	Parking	Building Heights	Phasing and Temporary Accommodations
							100 spaces		
Alt. 6	Heller, East Campus Infill, and Delaware Site Development	2,118 UG 140 FSH	0	594 UG East Campus Infill; 220 GS 2300 Delaware Ave.	3,072	0	Heller-338 spaces; 170 surface spaces; remainder decked on- or off-site (RCC lot)  East Campus Infill-100 spaces  Delaware -44 spaces	Heller, 5 to 7 stories; East Campus Infill, 7-8 stories; Delaware, 4 stories	Student families to be moved off-campus temporarily (location to be determined); childcare center at Granary
Alt. 7	Heller, East Campus Infill, and North Remote Site Development	1,212 UG 220 GS 140 FSH	0	594 UG East Campus Infill 906 UG North Remote	3,072	0	Heller-359 spaces; 170 surface spaces; remainder decked on- or off-site (RCC lot)  East Campus Infill-100 spaces  North Remote-70 spaces	Heller, 5 to 7 stories, East Campus Infill, 7-8 stories; North Remote, 5 to 7 stories	Student families to be moved off-campus temporarily (location to be determined); childcare center at Granary.

KEY

UG Undergraduate

GS Graduate Student

## Changes to Page 5.0-30 Text

The text on RDEIR page 5.0-30 has been revised to describe the potential population and housing impacts that could result from the temporary relocation of student families from the existing family student housing (FSH) into off-campus housing for the duration of time that it would take to construct replacement family student housing on the Heller site under Alternative 2.

### Other Resources

#### Timberland Conversion

The same less than significant timberland conversion impact that would occur at the Heller site under the proposed project, would occur under this alternative.

#### Population and Housing

Unlike the proposed project, this alternative would result in the temporary displacement of student families and would require that the University provide off-campus housing to these families for the duration that it would take to construct family student housing units on the Heller site. It is expected that 140 apartments would be needed off campus to house the displaced families and that this off-campus housing would be needed for approximately three years. According to the Brailsford & Dunlavey study, which was completed in April 2018, the availability of off-campus housing is low (the average vacancy rate for the surveyed properties was around 3 percent). Furthermore, the supply of off-campus housing is not expected to increase substantially. As stated in the RDEIR, according to the City's Housing Element, about 875 new dwelling units are likely to be added to the City's housing stock between 2014 and 2023. Due to the limited housing supply in the Santa Cruz area, there is some uncertainty as to whether units would be available for the University to lease. Nonetheless, because these 140 apartment units would be needed for 2 to 4 years, this analysis assumes that this number of housing units for student families would be found in the City of Santa Cruz.

The alternative would have the effect of adding about 140 student families to the population of Santa Cruz and of reducing available off-campus supply for others for a period of approximately three years. As both effects would be short term and temporary, they would be less than significant. Furthermore, there would be minimal secondary environmental impacts from leasing up to 140 housing units for three years for student families. The primary effect would be daily travel between the off-campus housing and the campus by the affected students, either via transit or personal vehicle. If the latter, there would be associated air, greenhouse gas, and noise

emissions. However, given the small number of students involved and the short duration, these impacts would be less than significant. No other environmental impacts would result from this alternative related to population and housing.

### **Changes to Page 5.0-36 Text**

The text on page 5.0-36 has been revised to describe the potential population and housing impacts that could result from the temporary relocation of student families from the existing FSH into off-campus housing for the duration of time that it would take to construct replacement family student housing on the Heller site under Alternative 3.

### **Other Resources**

#### **Timberland Conversion**

The same less than significant timberland conversion impact that would occur at the Heller site under the proposed project, would occur under this alternative.

#### **Population and Housing**

Unlike the proposed project, this alternative would result in the temporary displacement of student families and would require that the University provide off-campus housing to these families for the duration that it would take to construct family student housing units on the Heller site. It is expected that 140 apartments would be needed off campus to house the displaced families and that this off-campus housing would be needed for approximately four years. According to the Brailsford & Dunlavey study, which was completed in April 2018, the availability of off-campus housing is low (the average vacancy rate for the surveyed properties was around 3 percent). Furthermore, the supply of off-campus housing is not expected to increase substantially. As stated in the RDEIR, according to the City's Housing Element, about 875 new dwelling units are likely to be added to the City's housing stock between 2014 and 2023. Due to the limited housing supply in the Santa Cruz area, there is some uncertainty as to whether units would be available for the University to lease. Nonetheless, because these 140 apartment units would be needed for approximately four years and not on a permanent basis, this analysis assumes that this number of housing units for student families would be found in the City of Santa Cruz.

The alternative would have the effect of adding about 140 student families to the population of Santa Cruz and of reducing available off-campus supply for others for a period of approximately

four years. As both effects would be short term and temporary, they would be less than significant. Furthermore, there would be minimal secondary environmental impacts from leasing up to 140 housing units for approximately four years for student families. The primary effect would be daily travel between the off-campus housing and the campus by the affected students, either via transit or personal vehicle. If the latter, there would be associated air, greenhouse gas, and noise emissions. However, given the small number of students involved and the short duration, these impacts would be less than significant. No other environmental impacts would result from this alternative related to population and housing.

#### **Changes to Page 5.0-38 Text**

The text on RDEIR page 5.0-38, which describes the parking spaces included in Alternative 4, has been corrected to clarify that the parking spaces have been redesigned. The minor change has no effect on the analysis of the comparative impacts of this alternative.

This alternative would ~~provide up to approximately 336 parking spaces comprised of approximately 170 on-site surface parking spaces~~ also include an on-site MBR plant to serve the proposed housing, and approximately ~~166~~ 100 parking spaces in a decked capacity (either on-site by adding a parking deck to the southwestern parking lot or off site at the Rachel Carson lot) for students with families, undergraduate students, graduate student the childcare center, and service vehicles along with significant extensions of utility infrastructure and potential roadway development.

#### **Changes to Page 5.0-43 Text**

Alternative 4, Biological Resources. The fifth paragraph on RDEIR page 5.0-43 is corrected as indicated below.

Special-status plants also have a potential to occur at the North Remote site and the housing development would have the potential to affect special-status plants, should they be present on the site. ~~Similar to—~~Unlike the proposed project that would not affect special-status plants and require no mitigation, this alternative would result in a potentially significant impact that would be reduced to a less than significant level with implementation of SHW Mitigation BIO-2~~require mitigation.~~mitigation.



### Changes to Page 5.0-48 Text

The text on RDEIR page 5.0-48 under Other Resources has been revised to describe the potential population and housing impacts that could result from the temporary relocation of student families from the existing FSH complex into off-campus housing for the duration of time that it would take to construct replacement family student housing on the Heller site under Alternative 4.

#### Other Resources

##### Timberland Conversion

As with the proposed project, the timberland conversion impact would occur at the Heller site. In addition, development of about half the proposed student housing on the North Remote site would result in the development of a forested site. The site is not zoned Timberland Production. The project site is wooded, primarily with second growth redwoods, which is a commercial species. Therefore, the site would likely be considered timberland as defined in Public Resources Code Section 4526.1. This would require a timberland conversion permit from CAL FIRE and the preparation of a timber harvest plan. However, the acreage of timberland would be very small. Furthermore, the site is not zoned for any timber-related uses; the Campus does not use the site for growing timber; and commercial timber production would not be compatible with the 2005 LRDP land use designation or with the surrounding academic and residential land uses. Therefore, the alternative would not conflict with the existing zoning for, or cause the rezoning of, forest land or timberland. The alternative would convert approximately 6.45 acres of forest land at the North Remote site to non-forest use. The loss of forest land could result in adverse aesthetic, GHG, or biological resource impacts. These potential impacts of the alternative are discussed under Aesthetics, Biological Resources, and Greenhouse Gas Emissions. All of the potential impacts of the conversion of forest land to non-forest use would be less than significant with implementation of previously adopted LRDP EIR mitigation measures. *Population and Housing*

Unlike the proposed project, this alternative would result in the temporary displacement of student families and would require that the University provide off-campus housing to these families for the duration that it would take to construct family student housing units on the Heller site. It is expected that about 140 apartments would be needed off campus to house the displaced families and that this off-campus housing would be needed for approximately 27 months. According to the Brailsford & Dunlavey study, which was completed in April 2018, the availability of off-campus housing is low (the average vacancy rate for the surveyed properties

was around 3 percent). Furthermore, the supply of off-campus housing is not expected to increase substantially. As stated in the RDEIR, according to the City's Housing Element, about 875 new dwelling units are likely to be added to the City's housing stock between 2014 and 2023. Due to the limited housing supply in the Santa Cruz area, there is some uncertainty as to whether units would be available for the University to lease. Nonetheless, because these 140 apartment units would be needed for approximately 27 months, this analysis assumes that this number of housing units for student families would be found in the City of Santa Cruz.

The alternative would have the effect of adding about 140 student families to the population of Santa Cruz and of reducing available off-campus supply for others for a period of approximately 27 months. As both effects would be short term and temporary, they would be less than significant. Furthermore, there would be minimal secondary environmental impacts from leasing up to 140 housing units for approximately 27 months for student families. The primary effect would be daily travel between the off-campus housing and the campus by the affected students, either via transit or personal vehicle. If the latter, there would be associated air, greenhouse gas, and noise emissions. However, given the small number of students involved and the short duration, these impacts would be less than significant. No other environmental impacts would result from this alternative related to population and housing.

#### **Changes to Page 5.0-50 Text**

The text on RDEIR page 5.0-50, which describes the on-campus beds that would be developed under Alternative 5, has been adjusted to correctly state number of student beds that would be provided under this alternative. The minor change has no effect on the analysis of the comparative impacts of this alternative.

The Heller site would be redeveloped to provide approximately ~~2,420~~2,478 student beds, including ~~2,060~~ 2,118 undergraduate student beds, 220 beds for graduate students, 140 units for students with families, an expanded childcare facility, along with student support, dining, and amenity space.

#### **Changes to Page 5.0-60 Text**

The text on RDEIR page 5.0-60 under Other Resources has been revised to describe the potential environmental impacts that could result from the temporary relocation of student families from the existing FSH complex into off-campus housing for the duration of time that it would take to construct replacement family student housing on the Heller site under Alternative 5.

## Other Resources

### Timberland Conversion

As with the proposed project, the timberland conversion impact would occur at the Heller site. The majority of the ECI site could be classified as timberland; however, no part of the site is zoned as a Timberland Protection Zone. Development of the ECI site would require a timberland conversion permit from CAL FIRE and the preparation of a timber harvest plan. The site is not zoned for timber-related uses; is not used for growing timber; and commercial timber production would not be compatible with the 2005 LRDP land use designation or with the surrounding student housing and campus support land uses. Therefore, the alternative would not conflict with the existing zoning for, or cause the rezoning of, forest land or timberland. The alternative would convert approximately 3 acres of forest land to non-forest use. The loss of forest land could result in adverse aesthetic, GHG, or biological resource impacts. These potential impacts of the alternative are discussed under subheadings Aesthetics, Biological Resources, and Greenhouse Gas Emissions, above. All of the potential impacts of the conversion of forest land to non-forest use would be less than significant with implementation of previously adopted LRDP mitigation measures.

### Population and Housing

Unlike the proposed project, this alternative would result in the temporary displacement of student families and would require that the University provide off-campus housing to these families for the duration that it would take to construct family student housing units on the Heller site. It is expected that about 140 apartments would be needed off campus to house the displaced families and that this off-campus housing would be needed for approximately three years. According to the Brailsford & Dunlavey study, which was completed in April 2018, the availability of off-campus housing is low (the average vacancy rate for the surveyed properties was around 3 percent). Furthermore, the supply of off-campus housing is not expected to increase substantially. As stated in the RDEIR, according to the City's Housing Element, about 875 new dwelling units are likely to be added to the City's housing stock between 2014 and 2023. Due to the limited housing supply in the Santa Cruz area, there is some uncertainty as to whether units would be available for the University to lease. Nonetheless, because these 140 apartment units would be needed for approximately three years, this analysis assumes that this number of housing units for student families would be found in the City of Santa Cruz.

The alternative would have the effect of adding about 140 student families to the population of Santa Cruz and of reducing available off-campus supply for others for a period of approximately three years. As both effects would be short term and temporary, they would be less than significant. Furthermore, there would be minimal secondary environmental impacts from leasing up to 140 housing units for approximately three years for student families. The primary effect would be daily travel between the off-campus housing and the campus by the affected students, either via transit or personal vehicle. If the latter, there would be associated air, greenhouse gas, and noise emissions. However, given the small number of students involved and the short duration, these impacts would be less than significant. No other environmental impacts would result from this alternative related to population and housing.

### **Changes to Page 5.0-61 Text**

The text on RDEIR page 5.0-61, which describes project development under Alternative 6, has been adjusted to correctly state the number of student beds at the Heller site and building heights at the Delaware Avenue site. The minor changes have no effect on the analysis of the comparative impacts of this alternative.

The Heller site would be redeveloped to provide approximately ~~2,420~~2,258 student beds, including ~~2,060~~2,118 undergraduate student beds, 220 beds for graduate students, 140 units for students with families, an expanded childcare facility, along with student support, dining, and amenity space. Approximately 594 undergraduate beds along with student support and amenity space would be provided in buildings constructed on the ECI site. The 220 graduate student beds, along with appropriate support and amenity space, would be provided on a portion of the University-owned 2300 Delaware Avenue property (Delaware site) located in the western portion of Santa Cruz. The Hagar site would not be developed under this alternative.

Undergraduate student housing on the Heller site would be located in Buildings 1 through 4, which would be five to seven stories in height. Students with families would be housed in Building 5, which would be five to seven stories with the childcare center located on the ground floor. Elimination of one of the buildings included in the proposed project, would allow for better spacing for these two distinct student communities. This alternative would provide approximately 338 surface parking spaces at the Heller site, comprised of approximately 170 on-site surface parking spaces and approximately 168 parking spaces in a decked capacity (either on-site by adding a one-story parking deck to the southwestern parking lot or off-site at the Rachel Carson parking lot).

As with Alternative 5, about 594 undergraduate beds would be located within two seven to eight-story buildings along with additional student support and amenity space on the ECI site. The ECI site would provide for 100 parking spaces utilizing a decked facility approach. At the Delaware site, the proposed four ~~to five~~ story buildings for graduate students would be located on the parking lot and tennis courts at the northern end of the site. There is ample space at the Delaware site to add replacement surface parking to serve the proposed housing.

### Changes to Page 5.0-72 Text

The text on RDEIR page 5.0-72 under Other Resources has been revised to describe the potential environmental impacts that could result from the temporary relocation of student families from the existing FSH complex into off-campus housing for the duration of time that it would take to construct replacement family student housing on the Heller site under Alternative 6.

### Other Resources

#### Timberland Conversion

As with the proposed project, the timberland conversion impact would occur at the Heller site. See **Alternative 5, Other Resources**, for a discussion of impacts on timberland at the ECI site. The Delaware site is already developed with urban uses and no agricultural use or timberland is present at or adjacent to the site.

#### Population and Housing

Unlike the proposed project, this alternative would result in the temporary displacement of student families and would require that the University provide off-campus housing to these families for the duration that it would take to construct family student housing units on the Heller site. It is expected that about 140 apartments would be needed off campus to house the displaced families and that this off-campus housing would be needed for approximately three years. According to the Brailsford & Dunlavey study, which was completed in April 2018, the availability of off-campus housing is low (the average vacancy rate for the surveyed properties was around 3 percent). Furthermore, the supply of off-campus housing is not expected to increase substantially. As stated in the RDEIR, according to the City's Housing Element, about 875 new dwelling units are likely to be added to the City's housing stock between 2014 and 2023. Due to the limited housing supply in the Santa Cruz area, there is some uncertainty as to whether units would be available for the University to lease. Nonetheless, because these 140 apartment

units would be needed for approximately three years, this analysis assumes that this number of housing units for student families would be found in the City of Santa Cruz.

The alternative would have the effect of adding about 140 student families to the population of Santa Cruz and of reducing available off-campus supply for others for a period of approximately three years. As both effects would be short term and temporary, they would be less than significant. Furthermore, there would be minimal secondary environmental impacts from leasing up to 100 housing units for approximately three years for student families. The primary effect would be daily travel between the off-campus housing and the campus by the affected students, either via transit or personal vehicle. If the latter, there would be associated air, greenhouse gas, and noise emissions. However, given the small number of students involved and the short duration, these impacts would be less than significant. No other environmental impacts would result from this alternative related to population and housing.

#### **Changes to Page 5.0-73 Text**

The text on page 5.0-73, which describes the on-campus beds that would be developed under Alternative 7, has been adjusted to correctly state the number of student beds that would be provided under this alternative. The minor change has no effect on the analysis of the comparative impacts of this alternative.

The Heller site would be redeveloped to provide approximately ~~1,510~~ 1,572 student beds, including ~~1,150~~ 1,212 undergraduate student beds, 220 graduate student beds, and 140 units for students with families, an expanded childcare facility, along with student support, dining, and amenity space.

#### **Changes to Page 5.0-82 Text**

The text on page 5.0-82 under Other Resources has been revised to describe the potential environmental impacts that could result from the temporary relocation of student families from the existing family student housing (FSH) into off-campus housing for the duration of time that it would take to construct replacement family student housing on the Heller site under Alternative 7.

#### **Other Resources**

##### **Timberland Conversion**

As with the proposed project, the timberland conversion impact would occur at the Heller site. See **Alternative 5, Other Resources**, regarding timberland conversion impact at the ECI site and

**Alternative 4, Other Resources**, regarding timberland conversion impact at the North Remote site.

### *Population and Housing*

Unlike the proposed project, this alternative would result in the temporary displacement of student families and would require that the University provide off-campus housing to these families for the duration that it would take to construct family student housing units on the Heller site. It is expected that about 140 apartments would be needed off campus to house the displaced families and that this off-campus housing would be needed for approximately 27 months. According to the Brailsford & Dunlavey study, which was completed in April 2018, the availability of off-campus housing is low (the average vacancy rate for the surveyed properties was around 3 percent). Furthermore, the supply of off-campus housing is not expected to increase substantially. As stated in the RDEIR, according to the City's Housing Element, about 875 new dwelling units are likely to be added to the City's housing stock between 2014 and 2023. Due to the limited housing supply in the Santa Cruz area, there is some uncertainty as to whether units would be available for the University to lease. Nonetheless, because these 140 apartment units would be needed for approximately 27 months, this analysis assumes that this number of housing units for student families would be found in the City of Santa Cruz.

The alternative would have the effect of adding about 140 student families to the population of Santa Cruz and of reducing available off-campus supply for others for a period of approximately 27 months. As both effects would be short term and temporary, they would be less than significant. Furthermore, there would be minimal secondary environmental impacts from leasing up to 140 housing units for approximately 27 months for student families. The primary effect would be daily travel between the off-campus housing and the campus by the affected students, either via transit or personal vehicle. If the latter, there would be associated air, greenhouse gas, and noise emissions. However, given the small number of students involved and the short duration, these impacts would be less than significant. No other environmental impacts would result from this alternative related to population and housing.

## **Corrections to Section 7.1 Updated Water Supply Impact Assessment Changes**

One of the commenters recommends that the descriptions of future water supply projects presented in Section 7.1 of the RDEIR should be expanded to include alternatives that involve advanced treated purified recycled water that could help meet the water supply gap for the City of Santa Cruz. Three such projects are identified in the City of Santa Cruz Final Regional Recycled Water Facilities Planning Study.

Text describing these projects is hereby added to RDEIR Section 7.1 on page 7.2-45. The addition does not change the impact analysis or the conclusions of the analysis.

#### Changes to Page 7.2-45 Text

##### Other Recycled Water Reuse Projects

According to the City of Santa Cruz Final Regional Recycled Water Facilities Planning Study, in addition to direct reuse, recycled water could potentially be used to replenish groundwater, serve as seawater intrusion barrier, and used for reservoir and streamflow augmentation. The Planning Study identifies three groundwater replenishment projects as longer-term efforts that the City will work on with other regional partners, and states that these projects align with the WSAC strategies to address the water supply gap during times of extended drought. The first project has been advanced by the Soquel Creek Water District and is described below along with its environmental impacts. The other two projects are not adequately advanced to allow any analysis of environmental impacts at this time.

**Pure Water Soquel Project.** This project involves the conveyance of secondary treated effluent from the City's WWTP to an advanced treatment facility in Soquel where it would be purified by a three-step process that includes micro filtration, reverse osmosis, and ultraviolet light and advanced oxidation. The purified water would then be injected into the underlying groundwater basin for both recharge and to help counter sea water intrusion. The Soquel Creek Water District has completed an EIR for the project. The EIR concluded that all impacts of the project would either be less than significant or reduced to less than significant with mitigation, with one exception. The EIR found that at times, noise associated with the construction of the treatment facility and the injection wells would result in substantial noise that would not be reduced to levels below the applicable threshold even with mitigation, and therefore there would be a significant and unavoidable construction noise impact.